IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ASTORIA KING, **individually and on** **behalf of those similarly** **situated,** **Plaintiff,** vs. **THREE SISTERS** **ENTERTAINMENT, INC.,** **et al,** **Defendants.**	**CIVIL ACTION** **1:22-cv-04235-LMM**

JOINT NOTICE OF SETTLEMENT AND MOTION FOR TIME TO MOVE FOR SETTLEMENT APPROVAL

Plaintiff Astoria King ("Plaintiff"), individually and on behalf of all others similarly situated, and Defendants Three Sister's Entertainment, Inc. and Nianna Wright ("Defendants"), by and through their undersigned counsel, jointly notify the Court that the Parties have reached an agreement to resolve all remaining claims at issue in this matter and respectfully request 45 days to move for Court approval of the settlement. In support of this Motion, the Parties state the following:

1.   Plaintiff initiated this action on October 24, 2022, alleging that Defendants violated the Fair Labor Standards Act ("FLSA") by failing to pay Plaintiff proper minimum wages and overtime compensation. [Doc. 1].

2.   Plaintiff brought her FLSA claims as a putative collective action but

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ultimately did not file a Motion for Conditional Certification.

3.   Discovery in this matter is set to close on Friday, January 12, 2024.
[Doc. 30].

4.   The Parties have been engaged in discussions to determine whether
they can resolve all remaining claims of Plaintiff at issue and settle the case. As a
result of these discussions, the Parties have reached an agreement to resolve all
claims still at issue and settle the case.

5.   Because the Parties' settlement compromises Plaintiff's FLSA
claims, the Parties intend to seek the Court's approval of their settlement.

6.   The Parties are currently working on the settlement-related
documents, including the terms and conditions of their settlement agreement. The
Parties estimate that it will take up to 45 days to prepare the settlement agreement
and to prepare and submit the motion for settlement approval and supporting papers
for the Court's consideration.

7.   The Parties, therefore, respectfully request that the Court stay all
pending deadlines in this matter and provide the Parties 45 days to complete and
file the Motion for Settlement Approval and any related documents.

8.   This Motion is brought for good cause, will not unduly delay the
proceedings, and will not prejudice either Party. The requested stay of all pending

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deadlines is consistent with Rule 1, which states that the Federal Rules of Civil

Procedure "should be construed, administered, and employed by the court and the

parties to secure the just, speedy, and inexpensive determination of every action

and proceeding." Fed. R. Civ. P. 1.

9.   Defendants join Plaintiff in this request and in this Motion.

10.   For the Court's convenience, a proposed order is provided.

This 11th day of January, 2024.

Respectfully submitted,

PLAINTIFF ASTORIA KING

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